

### ***Remarks***

In furtherance of the Request for Continued Examination filed herewith, Applicants respectfully request reconsideration of this Application and consideration of the foregoing amendment, which is hereby submitted in accordance with 37 C.F.R. §§ 1.114 and 1.116(a).

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-26 are pending in the application, with 1, 11, 18, and 24 being the independent claims. Claims 1-7, and 11-23 are sought to be amended. New claims 24-26 are sought to be added. Support for these changes can be found, *inter alia*, in paragraphs 0031-0035, 0051-0053, 0064-0066, 0072, 0074, and 0078 of the Specification, and FIGs. 1-4b of the Drawings. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

### ***Personal Interview with Examiner***

A personal interview was held on Thursday, June 10, 2004 between Examiner Dalip K. Singh and Applicants' representative Kendrick Patterson (Registration No. 45,321). Applicants would like to thank the Examiner for a helpful and constructive interview.

During the interview, Applicants' representative and the Examiner discussed the Lindholm patent (U.S. Patent 6,198,488) and Applicants' claim 1. No agreements were reached; however, Applicants' representative offered to consider alternative ways to address the Examiner's concerns.

### ***Rejections under 35 U.S.C. § 102***

In the Office Action, the Examiner sustains his rejection of claims 1-23 under 35 U.S.C. § 102(b), as allegedly being anticipated by U.S. Patent No. 6,198,488 to Lindholm *et al.* (herein referred to as "Lindholm"). Although Applicants respectfully disagree, Applicants believe the Examiner's rejections are no longer valid and/or have been rendered moot by the proposed amendments.

Referring to the independent claims (namely, claims 1, 11, 18, and 24), Applicants have amended or added claims to more clearly recite features that are not disclosed in Lindholm. For example, with respect to the independent claims, Lindholm does not disclose a method, system, or computer program product for:

selecting a ***combination of functions***...each function including microinstructions that, when executed, implement a phase or a sub-phase of a mode.

Lindholm describes an inflexible system that only supports the processing of vertices, one at a time, at four processing modules (namely, a transform module, lighting module, rasterization module, an setup module) situated on a single semiconductor integrated circuit or chip. (See Column 2, lines 17-19, and Column 6, lines 44-56). Instructions are selected and executed at the time that a vertex is processed “in” each module.

Therefore, Lindholm does not describe “selecting a ***combination of functions***, each function including microinstructions that, when executed, implement a phase or a sub-phase of a mode.” Whereas Lindholm queries an address buffer to send instructions to each processing module (see Fig. 4A and col. 11, lines 3-7), Lindholm does not group together a “combination of instructions” for multiple “processing modules”, and deliver the “combination of instructions” to a single location, such as a microcode processor or microcode instruction memory, as recited in Applicants’ claims. Contrary to Lindholm’s hardwire pipeline, Applicants’ invention is independent of the type of computer platform and supports any combination of phases (i.e., functions) for rendering a desired graphics mode.

Therefore, Applicants respectfully submit that Lindholm does not disclose Applicants’ claimed invention as recited in independent claims 1, 11, 18, and 24. Dependent claims 2-10, 12-17, 19-23, and 25-26 depend from claims 1, 11, 18, and 24, respectively, and therefore, are patentable over Lindholm for at least the reasons stated above, in addition to the additional features recited therein. For example, claim 2 further recites “querying a storage medium to select said **combination**,” which is not taught by Lindholm. Claim 3 further recites “**loading said combination** into a microcode instruction memory,” which is not taught by Lindholm. Claim 25 further recites

"selecting a **merger group** from said library," which is not taught by Lindholm. Accordingly, Applicants respectfully request reconsideration and withdrawal of the Examiner's rejection of the claims 1-23, and allowance thereof. Additionally, Applicants respectfully request favorable consideration and allowance of new claim 24-26.

### ***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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